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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

12 Paul Mankin, individually and on behalf
13 of all others similarly situated,

14 Plaintiff,

15 v.

16 Mountain West Research Center, L.C.,
17 and does 1 through 10, inclusive, and
18 each of them,

19 Defendants.

Case No. CV13-06447-DSF (AGRx)

Assigned to Hon. Dale S. Fischer

**JOINT STIPULATION VACATING
TIME TO RESPOND TO THE
COMPLAINT**

Action Filed on September 3, 2013

Service Waived on September 12, 2013

Filed and Served with [Proposed] Order

STIPULATION

2 **WHEREAS**, plaintiff Paul Mankin (“Plaintiff”) and defendant Mountain
3 West Research Center, L.C. (“Defendant”), by and through their respective counsel
4 of record, hereby stipulate and agree as follows:

5 1. Defendant's response to the Complaint is due by July 1, 2014.

6 2. Over the last few months, the parties have been negotiating certain
7 changes to the settlement agreement and have now finalized those settlement terms.

8 3. A draft of Plaintiff's Motion for Preliminary Approval has been
9 circulated to Defendant. Defendant has reviewed the draft and submitted comments.
10 Plaintiff is now working on finalizing the Motion for submission to the Court.

11 4. Both lead counsel for Plaintiff are out of the country from June 16 until
12 the end of June.

13 5. The parties anticipate that Plaintiff will file his Motion for Preliminary
14 Approval by July 18, 2014.

15 6. The parties agree that filing a response to the Complaint given the
16 pending settlement and Motion related thereto would be a waste of litigant and
17 judicial resources.

18 **THEREFORE**, the parties respectfully request that the Court vacate the
19 deadline by which Defendant must respond to the Complaint in light of the pending
20 settlement.

22 | Dated: June 19, 2014

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